



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

December 3, 2007

Mr. Joseph Woo
Armed Forces Retirement Home
3700 North Capitol Street, NW
Washington, DC 20011-8400

Re: Final Environmental Impact Statement for the Armed Forces Retirement Home - Washington Master Plan (CEQ #20070479)

Dear Mr. Woo:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement for the Armed Forces Retirement Home in Washington, DC. Although most of EPA's comments were addressed in the Final Environmental Impact Statement (FEIS), EPA has remaining environmental concerns and suggests that the Armed Forces Retirement Home (AFRH) consider the comments listed below.

General

Although EPA recognizes the purpose and need for the proposed project, it is not certain that the extensive degree of development proposed is justified as current use and projected future use of the property is not included in the DEIS. The DEIS states that the "site is currently underutilized" but does not provide an analysis of the possible reasons for this other than the presumed assumption that there is undeveloped open space that can be developed to support community needs/amenities as well as provide revenue. It is not apparent that the residents were polled to determine what their needs are as well as if there is the demand to occupy the site with residents and tenants to support residential/hotel/medical/institutional/retail, etc. development that is proposed. Also, aside from the Grant Building and the King Hospital Complex, it is not certain whether other existing buildings would benefit from renovation/demolition, etc. which may then help to support and increase revenue. An assessment and inventory of existing buildings as well as their uses would provide a baseline and may serve to decrease the build alternatives which would reduce environmental and cultural resources impacts.

Cultural Resources

As indicated in the DEIS, the AFRH-W is a National Register-Eligible Historic District. The master plan alternatives would have direct, long-term, major, adverse impacts to cultural resources and the historic district. The pristine areas that characterize the AFRH-W area and that are associated with and represent historical significance will be lost due to the proposed

development. Additionally, new construction would likely alter the historic context of individual buildings and building groups. Cultural landscape features would be disrupted or lost entirely.

Although a Programmatic Agreement is being developed that will identify mitigation measures as well as design guidelines for the defined character areas, the loss of cultural areas is great and permanent. The DEIS does not propose scaling down the proposed developed areas to retain some (or all) of the intact character areas nor to preserve the open space/meadows or the historic cultural landscape. Thus, of the alternatives proposed, there is no significant difference in the degree of impact.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

A handwritten signature in dark ink, appearing to read "William Arguto", with a long horizontal stroke extending to the right.

William Arguto
NEPA Team Leader
Office of Environmental Programs

